

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE DIDI GLOBAL INC. SECURITIES  
LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates To: All Actions

**STIPULATION AND [PROPOSED] ORDER REGARDING  
BRIEFING OF PLAINTIFFS' MOTION TO COMPEL DOCUMENTS  
WITHHELD ON THE BASIS OF PRC LAW**

WHEREAS, on February 3, 2025, Plaintiffs filed a letter motion to compel the production of documents that Defendant DiDi Global, Inc. ("DiDi") withheld or redacted on the basis of PRC law. ECF 276.

WHEREAS, following the Court's order on Plaintiffs' motion to compel, DiDi served revised logs on March 20, 2025, and served further revised logs on April 11, 2025;

WHEREAS, on May 7, 2025, DiDi informed Plaintiffs that it has received authorization to produce certain documents currently being withheld on the basis of PRC law;

WHEREAS, Plaintiffs intend to file a motion to compel specific documents or categories of documents from DiDi's PRC law logs, and, depending on the volume of DiDi's anticipated production, Plaintiffs anticipate challenging more than 1,000 documents;

WHEREAS, given the volume of documents at issue, the parties have agreed to additional pages and time (beyond those allowed for discovery disputes in Your Honor's Individual Practices and Rules) to brief the motion to compel.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

1. Plaintiffs shall file a motion to compel certain documents DiDi is withholding based on PRC blocking statutes by May 16, 2025;
2. DiDi shall file an opposition to Plaintiffs' motion by June 6, 2025;
3. Plaintiffs shall file any reply (if necessary) in further support of their motion by June 13, 2025; and
4. Plaintiffs' opening brief and DiDi's opposition shall be a maximum of 15 double-spaced pages, and Plaintiffs' reply brief shall be a maximum of 7 double-spaced pages.

Respectfully submitted,

Dated: May 12, 2025

*/s/ Corey Worcester*

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*/s/ Laurence Rosen*

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Will Wei Cheng, Jean Qing Liu, Stephen  
Jingshi Zhu, Alan Yue Zhuo, Daniel Yong  
Zhang, Adrian Perica, and Kentaro Matsui*

**SO ORDERED.**

DATED: \_\_\_\_\_

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Hon. Lewis A. Kaplan, U.S. District Judge

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that on this 12th day of May, 2025, this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

*/s/ Laurence Rosen*